

REMARKS

Claims 1-28 are pending in this application, with Claims 1, 2, 6, 12, 13, 15, 16, 17, 19, 20, 23, and 26 being independent. Claims 2-11, 13-15, and 17-28 have been withdrawn from consideration.

Claims 1, 12, and 16 have been rejected under 35.U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,504,941 (Wong). Applicant respectfully traverses this rejection for the reasons discussed below.

As recited in independent Claim 1, the present invention includes, *inter alia*, the features of generating digital data which comprises a first data group required to maintain basic image quality and a second data group required to maintain detailed quality, changing the second data group in the digital data, and embedding a digital watermark in the changed second data group, wherein a change processing is different for respective users. Thus, according to the features recited in Claim 1, before a digital watermark is embedded in digital data, the digital data is changed by changing a second data group of the digital data in a manner that is different for respective users. This is described, for example, at least at page 11 of the specification. With the recited features of Claim 1, embedding of a digital watermark that is robust against alliance and average value attacks can be realized, and tampering with original data can be prevented.

Applicant submits that Wong fails to disclose or suggest at least the above-mentioned features recited in Claim 1. In particular, Wong does not disclose changing a second data group in digital data where the change processing is different for respective users. According to Wong, the LSB of an image block X_r is set to 0, not to a value according to respective users, before embedding value C_r in that data. Thus, an image obtained by such processing is not robust against alliance attacks (alliance attacks are described, for example, at page 3, line 23 to page 5, line 8 of the present specification).

On the other hand, when that embedding value C_r is affected by an average attack (described, for example, page 5, line 9 to page 6, line 9 of the present specification), an

original image can be obtained if an average, of images each having LSB including an affected embedding value, is 0.

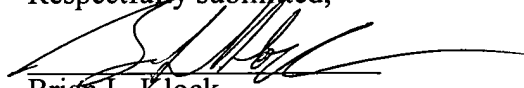
The Examiner asserts that Wong discloses change processing that is different for respective users merely because he asserts that different users insert different watermarks. However, as recited in Claim 1, the change processing that is different for respective users relates to changing the second data group in the digital data, i.e., the data into which the watermark is embedded. Thus, whether or not the watermark to be embedded is different for different users has no relationship whatsoever to whether the change processing performed on the data into which the watermark is to be embedded is different for respective users, as recited in Claim 1.

For the foregoing reasons, Applicant submits that the cited art fails to disclose, or even to suggest, at least the above-mentioned features of Claim 1. Independent Claims 12 and 16 recite similar features and are believed patentable for reasons similar to Claim 1.

In view of the foregoing, this application is believed to be in condition for allowance. Favorable reconsideration, withdrawal of the outstanding rejection, and an early Notice of Allowance are requested.

Applicant's undersigned attorney may be reached in our Washington, D.C. office by telephone at (202)530-1010. All correspondence should continue to be directed to our address given below.

Respectfully submitted,



Brian L. Klock
Attorney for Applicant
Registration No. 36,570

FITZPATRICK, CELLA, HARPER & SCINTO
30 Rockefeller Plaza
New York, New York 10112-3801
Facsimile: (212) 218-2200